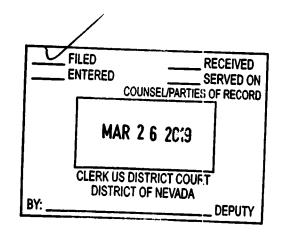
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DRDER-

Case No. 3:16-cv-00673-MMD-CBC

MOTION FOR EXTENSION OF TIME TO

JOHN QUINTERO,

Plaintiff,

vs.

CONNIE BISBEE, et al.,

Defendants.

FILE RESPONSIVE PLEADING (ECF No. 56)

(Second Request)

Defendants, Adam Laxalt and Joe Prieto (Defendants), by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Ian Carr, Deputy Attorney General, hereby submit their Motion for Extension of Time to File a Responsive Pleading (Second Request). This Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities,

and all papers and pleadings on file in this action.

MEMORANDUM OF POINTS AND AUTHORITIES

I. **ARGUMENT**

Defendants respectfully request a twenty-one (21) day extension of time out from the current deadline (March 25, 2019) to file a responsive pleading in this case. Counsel for Defendants is confronted with numerous competing deadlines and a high workload due to staffing changes in the Office of the Attorney General. However, such obstacles are currently being resolved and the requested extension of time should afford Defendants adequate time to file a responsive pleading in this case.

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Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if

party failed to act because of excusable neglect.

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Defendants' request is timely and its limited nature will not hinder or prejudice Plaintiff's case, but will allow for a thorough responsive pleading to Plaintiff's allegations. The requested twenty-one (21) day extension of time should permit Defendants time to adequately research and respond to Plaintiff's allegations. Defendants assert that the requisite good cause is present to warrant the requested extension of time.

the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the

For these reasons, Defendants respectfully request a twenty-one (21) day extension of time from the current deadline to file a responsive pleading in this case, with a new deadline to and including Monday, April 15, 2019.

DATED this 25th day of March, 2019.

AARON D. FORD Attorney General

By:

IAN E. CARR
Deputy Attorney General
State of Nevada
Bureau of Litigation
Public Safety Division

AN.

Attorneys for Defendants

IT IS SO ORDERED.

S MAGISTRATE JUDGE

dated:<u>3/7/e/2019</u>